

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR
9004-1(b)**

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In Re:

TARLOK SINGH,

Debtor.

Case No.: 16-27617- MBK

Judge: Michael B. Kaplan

Chapter: 13

RESPONSE TO SUPPLEMENTAL CERTIFICATION IN SUPPORT OF ORDER TO SHOW
CAUSE BY ESTATE OF MICHAEL MATTHEWS AND ORDER TO SHOW CAUSE

Movant: Dominic Simeone, Attorney for Estate of Michael Matthews

Respondent: ☒ Debtor ☐ Trustee ☐ Other:

Respondent, by and through his attorney, requests that this Court allows Debtor to proceed with Chapter 13 bankruptcy and to propose a repayment plan for confirmation, and the reasons for this request are:

1. The Debtor filed a Voluntary Petition under Chapter 11 of the United States Bankruptcy Code on 09/15/16.
2. An initial debtor interview was conducted on this matter on 10/06/16, for which the Debtor appeared.
3. A meeting of creditors was conducted on this matter on 10/20/16, for which the Debtor appeared.

4. The Debtor in this matter, Tarlok Singh, filing for Bankruptcy with the primary purpose of re-paying 100% of the arrears owed to its secured creditor, The Estate of Michael Matthews (“EMM”).
5. The Debtor is an immigrant, who speaks minimal English, and has faced difficulty in complying with the ongoing reporting requirements under Chapter 11. As a result, it was agreed and ordered for the Debtor’s case to convert to Chapter 13.
6. The Debtor is currently preparing its Chapter 13 Plan for filing with the Court and the Debtor has indicated it will be able to begin making plan payments upon the initial due date under the Plan.
7. Counsel for Debtor has also communicated with counsel for EMM to propose a stipulated settlement of its debt, to be paid 100% by the Debtor, but EMM has failed to respond on numerous occasions.
8. To date, there has been no bad faith by the Debtor. The Debtor has appeared at all requisite hearings in the case and is in the process of proposing a plan for 100% repayment to EMM with its first payment payable upon the due date under the Plan.
9. Accordingly, Debtor requests for the case to proceed under Chapter 13 to allow it to propose a repayment plan for confirmation.

WHEREFORE, it is respectfully requested that this Court allows Debtor to proceed with Chapter 13 bankruptcy and to propose a repayment plan for confirmation.

Certification

I hereby certify that the preceding statements made by me are true to the best of my knowledge. I understand that if any statement made by me is willfully false I am subject to punishment.

Date: February 25, 2017

/s/Harrison Ross Byck, Esq. _____
HARRISON ROSS BYCK, ESQ.